

JUDGE TORRES

22 MC 00110

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE SUBPOENA TO ACKMAN-ZIFF REAL)
ESTATE GROUP, LLC)

Misc. Action No. _____

NEXTDOOR, INC., a Delaware Corporation,)

Plaintiff,)

v.)

Civil Action No. 3:21-cv-03341-EMC
United States District Court for the
Northern District of California

420 TAYLOR VENTURES, LLC, a Delaware)
Limited Liability Company, NT 420 TAYLOR)
OWNER LLC, a Delaware Limited Liability)
Company, NH 420 TAYLOR OWNER LLC, a)
Delaware Limited Liability Company, 420)
TAYLOR HOLDINGS OWNER LLC, a Delaware)
Limited Liability Company, SEVEN EQUITY)
GROUP, LLC, and DOES 1-50,)

Defendants.)

NOTICE OF MOTION TO QUASH

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and pursuant to Federal Rule of Civil Procedure 45(d)(3) and Local Civil Rule 6.1, 420 Taylor Ventures, LLC, NT 420 Taylor Owner LLC, NH 420 Taylor Owner LLC, 420 Taylor Holdings Owner LLC, and Seven Equity Group, LLC (collectively, the "Moving Parties"), by and through the undersigned counsel, respectfully moves this Court to quash the subpoena *duces tecum* served by Nextdoor, Inc. on non-party Ackman-Ziff Real Estate Group, LLC. In the alternative, Moving Parties respectfully request that the Court enter an order substantially limiting the scope of the subpoena, along with such other and further relief as this Court deems just and proper.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

Dated: April 12, 2022

/s/ Lewis Ziropiannis

Lewis Ziropiannis

FOLEY & LARDNER LLP

90 Park Avenue

New York, New York 10016

Phone: (212) 682-7474

Fax: (212) 687-2329

lziropiannis@foley.com

*Attorney for 420 Taylor Ventures, LLC, NT
420 Taylor Owner LLC, NH 420 Taylor Owner
LLC, 420 Taylor Holdings Owner LLC and
Seven Equity Group, LLC*